

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

Investigation by the Department of Telecommunications and Energy on its own Motion into the Appropriate Pricing, based upon Total Element Long-Run Incremental Costs, for Unbundled Network Elements and Combinations of Unbundled Network Elements, and the Appropriate Avoided Cost Discount for Verizon New England, Inc. d/b/a Verizon Massachusetts' Resale Services in the Commonwealth of Massachusetts D.T.E. 01-20

AT&T'S THIRD SET OF INFORMATION

REQUESTS TO VERIZON

AT&T Communications of New England, Inc. hereby submits to Verizon the following information requests. Please provide responses to these requests as they are completed.

Instructions

1. Each request should be answered on a separate page preceded by the request and by the name of the person responsible for the answer.
2. Please provide answers as they are completed.
3. These requests shall be deemed continuing so as to require supplemental responses if Verizon subsequently receives or becomes aware of additional information responsive to these requests.
4. If an answer refers to Verizon's response to another information request in this proceeding, please provide that response with the answer.
5. If Verizon cannot answer a request in full, answer to the extent possible and state why Verizon cannot answer the request in full.
6. If Verizon refuses to respond to any request by reason of a claim of privilege, state the privilege claimed and the facts relied upon to support the claim of privilege.
7. Unless otherwise stated, these requests concern Verizon's Rhode Island intrastate operations.

INFORMATION REQUESTS

1. Please provide all switch contracts, competitive bids, quotes, and correspondence that control the price of new circuit switches in Verizon's operating territories.
2. Please provide invoices, telephone equipment orders and other documentation that impact prices for a recently purchased new host switch, new standalone switch, tandem switch and new remote switch in Verizon's territory for Lucent and Nortel. Please choose switches that, if not purchased in Massachusetts, are comparable to the size, type, engineering configuration and equipment that are in Massachusetts.
3. Please provide a detailed cost breakdown of individual function by type of work of engineering and installing a new host switch, new standalone switch, and new remote switch. Include any unsolicited quotes for engineering and installing a switch Verizon may have received.
4. Please confirm or deny whether Verizon has ever obtained a competitive bid or quote for installing a new host/standalone switch or a new remote switch. If the response is not an unqualified denial, please provide all relevant documents.
5. Please provide the latest Verizon engineering guidelines for switches for all Verizon territories. Please also provide the switch engineering guidelines for Massachusetts.

Respectfully submitted,

AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

By its attorneys,

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true copy of the above document to be served upon the attorney of record for each other party by hand or mail on May 8, 2001.
